

STATEMENT OF LEGAL AND FACTUAL BASIS

SIGNIFICANT PERMIT MODIFICATION

U.S. Naval Base, Norfolk
Sewells Point, Norfolk, Virginia
Permit No. TRO60941

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, U.S. Naval Base, Norfolk has applied for a Significant Modification to the Title V Operating Permit for its naval base in Norfolk, Virginia. The Department has reviewed the application and has prepared a modified Title V Operating Permit.

Permit Writer / Contact: _____

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FACILITY INFORMATION

Permittee

Regional Engineer
By Direction of
Commander, Navy Region Mid-Atlantic

Facility

U.S. Naval Base, Norfolk
Sewells Point
Norfolk, Virginia

AFS ID No. 51-710-00194

SOURCE DESCRIPTION - Navy Public Works Center

SIC Code 9711 - National Security

The facility is the public works/operations, supply and maintenance department at the home port of the Navy's Atlantic Fleet. No products are manufactured at the facility. There is not one distinct, overriding "process" conducted at this facility. Instead, various activities and operations are conducted primarily to provide steam (heat) and, in certain instances, electricity to most of the operations at the facility. Various maintenance activities are also performed throughout Naval Station Norfolk.

The entire facility is a Title V major source of sulfur dioxide, nitrogen oxides (as NO₂), carbon monoxide and hazardous air pollutants. This source is located in an attainment area for all pollutants, and is a PSD-sized source. Several emissions units located at the public works center portion of the facility were previously permitted under minor NSR permits, issued on June 13, 2003 (supersedes permit dated May 17, 2001), February 5, 2003, October 10, 2002, December 8, 1999, May 19, 1999, and August 2, 1985.

REQUESTED MODIFICATION and REASON FOR MODIFICATION

On May 27, 2003, the Virginia Department of Environmental Quality issued a Title V Operating Permit to U.S. Naval Base, Norfolk. After issuance, the source discovered errors and omissions that must be corrected and/or incorporated.

APPLICABILITY OF 9 VAC 5-80-230

This permit modification will delete requirements existing in the current Title V Operating Permit. It will also add requirements omitted during the initial permitting process. As this is the case, this modification will be processed using the Significant Modification Procedures as defined in 9 VAC 5-80-230.

CHANGES TO TITLE V OPERATING PERMIT

Changes to the Title V Operating Permit are outlined in the table attached to this Statement of Basis. The table identifies the affected conditions in the current permit, and the corresponding condition for the modified permit.

PUBLIC PARTICIPATION

The public participation requirements of 9 VAC 5-80-270 apply to this significant permit modification. A 30-day public notice is required.

PERMIT REVIEW BY EPA AND AFFECTED STATES

The EPA and affected states review requirements of 9 VAC 5-80-290 apply to this significant permit modification. A 45-day EPA review period is required. North Carolina is an affected state, and will be notified of this significant permit modification.

Changes requested for current permit:

Item	Old Page	New Page	Unit ID #	Change Requested	Emission Increase	New Applicable Requirement
1	5	4		Change responsible official to George E. Eichert (Captain, CEC, USN... same)	N/A	N/A
2	8 24 88	9 45	WOOD-010	Remove SP-233 woodshop. Equipment moved to WOOD-013 at A-81. Cyclone abandoned.	Decrease	N/A
3	17	19	PWC fuel burning equipment	III.C.35 weekly emission reports required for all units in III, not just BOIL-044-046.	N/A	N/A
4	26	21		VI.B.3.a indicate records are required only for Kb tanks from A.1 (list in A.1 as TNKA-145, 147, 148, 153, 154, 155, 311)	N/A	N/A
5	26	21	TNKA-136 TNKA-137	Include in listing of applicable units since A.2 (permit samples) applies. Exclude from A.1 (Kb). Constructed prior to 1984.	N/A	N/A
6	26	21	TNKA-180	Exclude from A.1 (Kb). Constructed prior to 1984.	N/A	N/A
7	26	21	TNKA-300 TNKA-301	Exclude from A.1 (Kb). Vapor pressure<lpsia.	N/A	N/A
8	30 36 37 38 72 73	5	BOIL-005 BOIL-050	Remove units on page 30, remove combustion section pages 36-38, and remove facility-wide conditions XIX.A.1 and C.11 on pages 72-73. Boilers removed and permit rescinded.	Decrease	N/A
9	30	6-7	Various ICGF	Request kW be shown in "size/rated capacity" column for ease of reference. <ul style="list-style-type: none"> ▪ ICGF-049 (1,000 kW) ▪ ICGF-075 (800 kW) ▪ ICGF-081 (664 kW) ▪ ICGF-094-096 (2000 kW ea) ▪ ICGF-097 (1000 kW) ▪ ICGF-142/143 (795 kW ea) ▪ ICGF-212/213 (800 kW ea) 	N/A	N/A
10	30 31 42	7 22-27	ICGF-236	125 kW generator at CEP-209 has applicable requirements even though it is insignificant by size. Permit date 12/8/99. Added applicable requirements.	N/A	-Annual VE -Opacity limit -Allowed fuel -12 mo. Hrs
11	31	7	ICGF-238-241	Building W-143 (versus W-123).	N/A	N/A
12	31 45 46	5 28-30	ABRA-105	Remove unit ID. There is no separate sanding booth. The ID is for sanding within the paint booth at LP-14 (PNTS-011).	N/A	N/A
13	31 45,46	7 28-30	ABRA-108	Remove unit ID, does not vent to outside of building.	Decrease	N/A

14	31 68 69	6 48-49	FIRI-004	Filter is 2 stage versus 3 stage. Building is MCA-604. Permit date is 7/23/03.	None	N/A
15	31	7 28-30	MISC-100 MISC-101	Sanding/sawing operation at CEP-209 has applicable requirements even though it is insignificant by emissions level. Permit date 12/8/99. Added applicable requirements.	None	-Monthly VE -12 mo. pounds
16	31 48	7 31	PNT0-011	Change building for HC-2 to SP-35.	N/A	N/A
17	32	7	PNT0-013	Change building to LP-3.	N/A	N/A
18	32 129	8 59	PNT0-026	Remove from description "2 hoods for small objects, ID PNTS-060 & 061" and add hoods to page 129 insignificant list.	None- included in PNT0- 026.	N/A
19	32 48	8 31	PNT0-100	Change building for HCS-4 to SP-35.	N/A	N/A
20	33 48	8 31	PNT0-103 PNT0-104	Change building to LP-2.	N/A	N/A
21	33 48	8 31	PNT0-105 PNT0-106	Change building to LP-27.	N/A	N/A
22	33	8	PNT0-127	Add ship painting pier-side by contractors.	None-see note (A)	N/A
23	33	9	PNTS-020	Add to description "ground support equipment".	N/A	N/A
24	33	9	PNTS-066	Add to description "miscellaneous metal parts".	N/A	N/A
25	33 129	9 59	PNTS-067 PNTS-068	These two booths are insignificant as stated in our permit application. Request they be moved to the insignificant list on page 129 and removed from page 33. Since they paint aircraft panels for training purposes (panels are never installed on actual aircraft) we believe they are exempt from the provisions of the aerospace NESHAP and there are therefore no applicable requirements.	N/A	N/A
26	33 48	8 31	PNTS-075	Delete. Painting is not performed at NM-37.	N/A	N/A
27	34	9	PNTS-100	Change HC-8 to HC-6.	N/A	N/A
28	34	9	PNTS-122	Add to description "AIMD 500, replaces PNTS-011"	N/A	N/A
29	34	9	PNTS-123	Add to description "AIMD 400 prop shop, replaces PNTS-018"	N/A	N/A
30	34	10	WOOD-012	Woodworking shop at SP-83 has 2 cyclones.	Increase equals decrease from WOOD-016	-Annual VE -Annual internal inspection
31	34 63	10 45	WOOD-016	Remove woodworking shop at V-88. It does not vent to the outside of the building.	Decrease	None
32	35 63	10 45	WOOD-021	Remove woodworking shop at W-126. Equipment moved to W-135 with no outside vent.	Decrease	None

33	39	21	ICGF-075	Add 800 kW generator. Previous comment to delete based on size was an error.	N/A	N/A
34	39	22	ICGF-094 ICGF-095 ICGF-096 ICGF-097	Remove condition A.2 related to 200 hour/year peak shaving limit as per revised 6/13/03 permit.	N/A	N/A
35	40	23 A.6	ICGF-094 ICGF-095 ICGF-096 ICGF-097	A.7 opacity limit is 15%/20% in revised NSR permit (missing "...except for one six-minute period of 20%").	N/A	N/A
36	43	26	ICGF-238 ICGF-239 ICGF-240 ICGF-241	Revise C.18.a to read "number of operating hours for each unit per year (rolling 12 month basis) and delete ICGF-94-97.	N/A	N/A
37	43	26	ICGF-094 ICGF-095 ICGF-096 ICGF-097	Add to C.18.e (maintenance and training records) as per revised NSR permit dated 6/13/03.	N/A	N/A
38	48	31	All	Note page 48 listing of paints has been revised.	N/A	N/A
39	48	31	PNTS-SHIP	PNTS-026 building is "V-88" and description is "small craft"	N/A	N/A
40	48	31	PNTS-SHIP	PNTS-038 building is "Resolute", description is "submarines"	N/A	N/A
41	48	31	PNTS-SHIP	PNTS-107 change description to "ships forces waiver". Add ID PNTS-127 for contractor painting	None-see note (A)	N/A
42	32 48	8 31	PNTS-SHIP	Add PNTS-108 Pier-side, tenant Port Operations, description "small craft".	None-see note (A)	N/A
43	32,48 128	8,31 59	PNTS-SHIP	Add PNTS-109 SP-31, tenant HM-14, description small craft.	None-see note (A)	N/A
44	32,48 128	8,31 59	PNTS-SHIP	Add PNTS-112 Piers, tenant Spruce Barge, description sub decks	None-see note (A)	N/A
45	32 48 128	8,31 59	PNTS-SHIP	Add PNTS-123 CEP-200, tenant SIMA 67x, description rubber cable moulding primer.	None-see note (A)	N/A
46	32 48 128	8,31 59	PNTS-SHIP	Add PNTS-124 CEP-160, tenant SIMA 72B, description ships and ship parts	None-see note (A)	N/A
47	33,48 128	8,31 59	PNTS-SHIP	Add PNTS-128 Piers, tenant Moran, description tug boats.	None-see note (A)	N/A
48	33 48 128	9,31 59	PNTS-SHIP	Add PNTS-060 & 061 @ V-88. Tenant VC-6, description small-boat parts. As these are insignificant, I don't believe monitoring (VE) should be required.	None-see note (A)	N/A
49	48	31	PNTS-BOTH	Rename as "PNTS-OTHER" to avoid confusion since there are booths located in the PNTS-SHIP and PNTS-AERO groups.	N/A	N/A
50	48	31	PNTS-OTHER	PNTS-020 Building is SP-356.	N/A	N/A
51	48	31	PNTS-OTHER PNTS-AERO	Move PNTS-066 at X-137 to PNTS-OTHER from PNTS-AERO group. This is not an aerospace source. Tenant	N/A	N/A

				"FISC". Description "miscellaneous parts".		
52	48	31	PNTS-AERO	PNTS-037 description should be "Open hanger touch up of fully assembled aircraft".	N/A	N/A
53	48	31	PNTS-AERO	Delete PNTS-109. No painting is done at this operation.	N/A	N/A
54	48	31	PNTS-AERO	PNTS-122 add to description "replaces PNTS-011"; AIMD 500	N/A	N/A
55	48	31	PNTS-AERO	PNTS-123 add to description "replaces PNTS-018"; AIMD 400	N/A	N/A
56	49	32	PNTS-066	A.1 add PNTS-066 at X-137. Or use Group ID PNTS-BOOTH.	N/A	N/A
57	49	32	PNTS-122 PNTS-123	A.1 remove PNTS-122/123 as opacity is limited to 5% in A.8.	N/A	N/A
58	49	32	Various	A.3 list booths rather than "all PNTS units" since some PNTS units are not booths. Add PNTS-066. A.3 list should read: PNTS-011, 018, 019, 020, 064, 066, 121, 122, 123. Or use PNTS-BOOTH.	N/A	N/A
59	57	40 B.35	PNTS-066	B.32 add PNTS-066 at X-137 or use PNTS-BOOTH.	N/A	N/A
60	59	42 C.42d	PNTS-122 PNTS-123	Indicate that C.39.d applies to PNTS-122/123 only (as was done in C.39.a-c)	N/A	N/A
61	63 64 146	45 46 66	WOOD-002	Remove unit at CA-483. Does not vent to the outside of the building. Not on page 34/35.	Decrease	N/A
62	63	45	WOOD-023	Remove unit at U-20. Removed ~ 2000. Not on page 34/35 or insignificant list.	Decrease	N/A
63	33 63	10 45	WOOD-025	Add unit at W-131. Tenant is DDNV. Also page 34/35. Control device is cyclone.	Increase equals decrease from WOOD-023	-Annual VE -Annual internal inspection
64	66	47	GSTA-005 GSTA-025 GSTA-096	Believe the MCE-224 service station should be included for stage I vapor recovery. The station dispensed 869,000 gallons in CY 2002.	N/A	Stage 1 monitoring
65	75	55	CLNO-119	Remove duplicate of CLNO-053	N/A	N/A
66	76	56	GSTA-097	Remove, tank moved to Cheatham	Decrease	N/A
67	84	64	TNKA-492	Remove, tank moved to Cheatham	Decrease	N/A
68	84	65	TNKU-043 TNKU-044 TNKU-045	Change description to various fuel oils (#2, #4, #6, DFM, FOR, NSFO).	N/A	N/A
69	84	66	TNKU-225 TNKU-226	Remove, tanks removed when LP-167 boilers converted to NG.	Decrease	N/A
70	89	71	PNT0-004 Q-72	Not applicable to 4-34; fully assembled marine vessel coating	N/A	N/A
71	91	55	CLNO-012 CLNO-101 CLNO-102 CLNO-103	Remove units at SP-356, LP-14, and SP-10. Do not exist.	N/A	N/A

72	91	55	CLNO-048	Remove unit. It is part of DEGS-GRP1 degreasing/solvent cleaning group.	N/A	N/A
73	91	55	CLNO-104	Change building to SP-35.	N/A	N/A
74	91	55	CLNO-107	Change building to SP-35.	N/A	N/A
75	92	55	CLNO-113 CLNO-114	Change building to LP-2.	N/A	N/A
76	92	55	CLNO-115 CLNO-116	Change building to LP-27. CLNO-116 tenant is VAW-126.	N/A	N/A
77	92	55	CLNO-118	Change building to LP-3.	N/A	N/A
78	92	55	CLNO-120	Change building to CEP-209. Change tenant to SIMA 57B.	N/A	N/A
79	92	55	CLNO-121 CLNO-122	Remove, no paint gun washers. Brush/roller only (CEP-200).	N/A	N/A
80	93	55	DEGS-GRP1	Remove "19".	N/A	N/A
81	95	55	GSTA-044 GSTA-045	Remove "hand" from pump description. Converted to electric. (LP-117)	N/A	N/A
82	99 to 136	55- 66	Various	Remove units at Deperming Station, which is located in the western branch of the Elizabeth River and is neither shore-based nor contiguous with Naval Station Norfolk. Units are ICGF-055, 170, 171, 217 and TNKA-250, 251, 254, 332, 379.	Decrease	N/A
83	105	56	ICGF-072	Building is LP-205.	N/A	N/A
84	125	58	MISC-050	Remove JP-5 flow bench at SP-10. Does not exist.	Decrease	N/A
85	125	58	MISC-052	Remove PAHWTF liquid feeds system. Permit rescinded. System won't be built.	N/A	N/A
86	125	58	MISC-102	Remove CEP-200 portsmouth plug making operation. It does not vent to the outside.	Decrease	N/A
87	128	59	PNTS-013	Remove, booth removed 1999.	Decrease	N/A
88	128	59	PNTS-037	Add touch up painting of aircraft at LP-167 NADEP.	None-See note (B)	N/A
89	128	59	PNTS-108	Change description from "Pier H" to "Pier-side"	N/A	N/A
90	129	59	PNTS-111	Remove spruce barge powder-coating operation. No VOC or PMHAP emitted.	N/A	N/A
91	129	59	PRNT-011	Remove "E."	N/A	N/A
92	133	61	TNKA-221	Remove. LP-167 boilers converted to natural gas.	Decrease	N/A
93	134	61	TNKA-302	Remove. U-46 tank removed.	Decrease	N/A
94	138	63	TNKA-445	Change building to U-126.	N/A	N/A
95	139	64	TNKA-466	Change building to Q-50.	N/A	N/A

96	139	64	TNKA-468	Remove diesel dispensing at NH-54.	Decrease	N/A
97	141	64-65	TNKA-501 TNKA-502 TNKA-503 TNKA-504	Add tanks at W-143	VOC PTE 0.16 TPY per form 7	N/A
98	141	65	TNKU-012	Remove unit. CA-99 boiler converted to natural gas.	Decrease	N/A
99	141	65	TNKU-039	Remove unit. CEP-57 UST replaced by TNKA-460.	Decrease	N/A
100	148 149 151	66 67	IWTP-007 IWTP-008 IWTP-009	The IWTP is inactive and scheduled for demolition. The permit for the sludge-dryer and baghouse was rescinded 2/27/03. <ul style="list-style-type: none"> • 40 CFR 60 Subpart O • 40 CFR 61 Subpart E • 40 CFR 63 Subpart QQ 	Decrease	N/A
101	152	71	Various	Add as fully assembled ship painting (N/A to Rule 4-34) <ul style="list-style-type: none"> • PNT0-026, V-88 • PNT0-109, SP-31 • PNT0-112, piers(spruce barge) • PNT0-127, piers(contractors) • PNT0-128, piers (tugboats) 	N/A	N/A
102	152	71	Various	Change fully assembled aircraft painting (N/A to Rule 4-34) <ul style="list-style-type: none"> • Delete PNT0-009 • Add PNT0-11, SP-35 • Add PNTS-037, LP-167 • Change PNT0-104 to LP-2 • Change PNT0-105/106 to LP-27 	N/A	N/A
103	154	67	MISC-051	Delete reference to inapplicable requirements for plasma unit MISC-051. Plasma was never built. Air permit rescinded. (40 CFR 60 Subparts Eb,E,CCCC,EEE)	N/A	N/A

Changes incorporated that were not listed in initial request:

Item	Old Page	New Page	Unit ID #	Change Requested	Emission Increase	New Applicable Requirement
104	80	58	ICGF-218	Change building to LP-43	N/A	N/A
105	None	6	ENGT-GRP1	Add Engine Testing ENGT-001-006	N/A- in permit appl.	None-future NESHAP only if units modified or reconstruc.
106	None	22-27	ICGF-236	Add 12/8/99 NSR permit requirements	N/A- in permit appl.	-Rolling 12 -Opacity -Annual VE -Fuel type
107	None	32-33	PNTS-121	Add 12/8/99 NSR permit requirements	N/A- in permit appl.	-Rolling 12 -Dry filter
108	None	28-30	MISC-100/101	Add 12/8/99 NSR permit requirements	N/A- in permit appl.	-Rolling 12 -Fabric filter -Opacity -Monthly VE
109	31-34	7-9	Various PNT	Add type of operation to description (ship, aircraft ect)	N/A	N/A
110	32	9	PNTS-018	Add	N/A	N/A
111	30 39-43	6-7 22-27	ICGF-094-097	Permit re-issued 6/13/03	N/A	N/A
112	3 72	2 52	Section XII	Rename section as Off-Site Waste and Container (NESHAP)	N/A	N/A
113	141	65	TNKU-034	Remove TNKU-034 for BOIL-005/050.	N/A	N/A
114	All	All	All	Combine all sections-remove PWC versus OSM designations.	N/A	N/A
115	152	71	PNT*	Add all painting not otherwise exempt from Rule 4-34 as fully assembled aircraft or ships. Remainder of painting is for repair/refinishing only and therefore not applicable to Rule 4-34.	N/A	N/A
116	75 91-92	55	CLNO-GRP1	Group paint gun washers together as CLNO-GRP1 for ease of reference. Washers are added, removed, and moved frequently. Previous comment 65, 73-79 now N/A.	N/A	N/A

Notes

- (A)No emissions increase. Ship Painting sources were formerly grouped together under one UNIT ID number but are now assigned separate ID numbers for each operation.
(B)No emissions increase. Usage was previously included in booth calculations.